

Discovery

a. Early Discovery

Although court-sanctioned discovery cannot begin before the initial attorney conference pursuant to Fed. R. Civ. Proc. 26(d), the court nevertheless encourages early discovery by agreement before the conference occurs.

b. Discovery should move as rapidly as is practical

The court will not accede to stipulated discovery periods or extensions of cut-off dates, which affect other dates, or that are longer than necessary or without good cause being shown. Filing a motion does not change discovery deadlines.

c. Discovery Disputes

Discovery disputes will generally be referred to a Magistrate Judge. [Local Rule 37.1](#) requires the parties to attempt to narrow their disagreements in regard to discovery. Improper delays or uncooperativeness in discovery will result in assessments of costs. The inability of a Magistrate Judge to resolve a discovery dispute, and the need for the court to involve itself in such, will be regarded as an indication of impropriety or uncooperativeness on the part of counsel.

d. Depositions

Attorneys defending a deposition witness must not impede legitimate questioning of the witness. Objections to deposition questions, other than those which if not made at the deposition are not preserved for trial, should be made very concisely, or omitted entirely, until trial.

e. Protective orders

Protective orders may be sought only for portions of documents that are actually confidential; the entire document may not be filed under seal unless all its contents qualify for protection.